



September 27, 2024

VIA ECF

The Honorable Dale E. Ho
 U.S. District Judge
 U.S. District Court for the Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Re: United States v. M/Y Amadea, No. 23-cv-9304 (DEH)

Dear Judge Ho:

This firm represents Claimants in the above-referenced matter. We write in response to and in support of third-party witness [REDACTED]’s (the “witness”) motion to quash the government’s subpoena for deposition testimony dated September 7, 2024 (ECF Nos. 259-263). Based on the witness’s memorandum of law and the witness’s declaration in support (ECF Nos. 260, 260-1, 263, 263-1), the witness does not have information relevant to this case for at least two reasons. First, the witness’s advisory role with respect to providing investment advice to the family investment vehicles of Suleiman Kerimov had “already substantially diminished in 2017 and ended entirely in 2018” (ECF No. 260-1, ¶ 2), long before the relevant time period in this case, which is between the late summer of 2021 to the spring of 2022. Second, the witness explains that he “became aware of the relationship” between Mr. Kerimov and his nephew, Nariman Gadzhiev, but nothing about that vague statement is relevant to this case. The government has not alleged that Nariman Gadzhiev has anything to do with this case. Moreover, contrary to the government’s assertion in its letter in opposition (ECF. No. 268), the witness’s motion does not at all “concede” that the witness has “firsthand knowledge that Nariman Gadzhiev has long managed Kerimov’s financial affairs.”

For these reasons, Claimants respectfully request that the Court quash the subpoena relating to this witness.

Respectfully Submitted,

/s/ Adam C. Ford

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